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UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

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In re	:	Chapter 11
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DELPHI CORPORATION, <u>et al.</u> ,	:	Case No. 05-44481 (RDD)
	:	
Debtors.	:	(Jointly Administered)
	:	
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EXHIBIT D-11
LITIGATION (INSURANCE RECOVERY)
468.5 HOURS

SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP AND AFFILIATES

Delphi Corporation (DIP)
Litigation (Insurance Recovery)

Bill Date: 11/30/06
Bill Number: 1132369

NAME	DATE	HOURS	DESCRIPTION
HOGAN III AL	10/20/06	1.20	REVIEW AND ANALYZE MOTION CONCERNING INDEMNIFICATION OF FORMER EMPLOYEES AND OFFICERS (1.2).
HOGAN III AL	10/25/06	0.60	REVIEW MATERIALS IN CONNECTION WITH INDEMNIFICATION MOTION (0.6).
		1.80	
Total Partner		1.80	
SHIVAKUMAR D	10/20/06	3.70	ANALYSIS INDEMNIFICATION-RELATED MOTIONS AND RELATED LEGAL RESEARCH (3.7).
SHIVAKUMAR D	10/23/06	9.20	LEGAL RESEARCH RE: INDEMNIFICATION AND D&O INSURANCE ISSUES IN CHAPTER 11 CASES IN RESPONSE TO MOTIONS FILED BY FORMER EMPLOYEES (9.2).
SHIVAKUMAR D	10/24/06	4.60	LEGAL RESEARCH RELATING TO MOTIONS FILED BY FORMER D&OS CONCERNING INDEMNIFICATION (4.6).
SHIVAKUMAR D	10/25/06	6.30	LEGAL RESEARCH ON ISSUES RAISED BY FORMER D&O EMPOLYEES' INDEMNIFICATION-RELATED MOTIONS (6.3).
SHIVAKUMAR D	10/26/06	8.60	ANALYZE INSURANCE CONTRACTS AND PERFORM RELATED RESEARCH IN RESPONSE TO INDEMNIFICATION-RELATED MOTIONS FILED BY FORMER EMPLOYEES (8.6).
SHIVAKUMAR D	10/27/06	8.80	ANALYZE D&O INSURANCE CONTRACTS AND PERFORM RELATED LEGAL RESEARCH IN RESPONSE TO FORMER D&O MOTIONS (8.8).
SHIVAKUMAR D	10/30/06	10.20	ANALYZE ISSUES RAISED BY INDEMNIFICATION-RELATED MOTIONS FILED BY FORMER EMPLOYEES (5.5); LEGAL RESEARCH RE: SAME (4.7).
SHIVAKUMAR D	10/31/06	8.80	FURTHER ANALYSIS OF INSURANCE AND INDEMNIFICATION-RELATED ISSUES IN RESPONSE TO MOTIONS FILED BY FORMER EMPLOYEES (3.5); ADDITIONAL LEGAL RESEARCH RE: SAME (5.3).
		60.20	
Total Counsel		60.20	
MACDONALD N	10/30/06	10.10	CONTINUE LEGAL RESEARCH ON MATTERS RELATED TO INDEMNIFICATION AND ADVANCEMENT OBLIGATIONS IN BANKRUPTCY (7.4); DOCUMENT REVIEW RELATED TO SAME (2.7).

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MACDONALD N	10/31/06	8.10	CONTINUE LEGAL RESEARCH ON MATTERS RELATED TO INDEMNIFICATION AND ADVANCEMENT OBLIGATIONS IN BANKRUPTCY (8.1).
		18.20	
MEISLER RE	10/20/06	0.80	REVIEW PLEADINGS RE: MOTIONS OF FORMER EMPLOYEES REQUESTING ADVANCEMENT OF FEES AND EXPENSES (0.8).
MEISLER RE	10/23/06	0.60	RESEARCH SERVICE OF PLEADINGS AS RAISED BY MOVANTS IN THEIR MOTION TO COMPEL INDEMNIFICATION (0.5); REVIEW CORRESPONDENCE RE: MOTION TO COMPEL INDEMNIFICATION (0.1).
MEISLER RE	10/24/06	1.10	DRAFT INTERNAL CORRESPONDENCE RE: SERVICE OF PLEADINGS AS RAISED BY MOVANTS IN THEIR MOTION TO COMPEL INDEMNIFICATION (0.5); CONTINUE TO RESEARCH NOTICE INQUIRY RE: HUMAN CAPITAL MOTION AND ORDER (0.3); REVISE AND CIRCULATE INTERNAL CORRESPONDENCE RE: SAME (0.3).
MEISLER RE	10/25/06	2.60	CONTINUED ANALYSIS OF MOTION TO COMPEL INDEMNIFICATION (2.2); DRAFT CORRESPONDENCE RE: DOCUMENTS TO REVIEW IN CONNECTION WITH SAME (0.4).
MEISLER RE	10/26/06	0.20	REVIEW ISSUES RE: MOTION FOR INDEMNIFICATION (0.2).
MEISLER RE	10/27/06	0.40	CONTINUE TO WORK ON ISSUES RELATED TO MOTION FOR ADVANCEMENT OF FEES AND EXPENSES (0.4).
		5.70	
Total Associate		23.90	
ROSEN R	10/20/06	0.90	ASSIST REQUESTING TEAM ATTORNEY RE: PREPARATION OF BINDER CONTAINING VARIOUS CH. 11 PLANS WITH PROVISIONS FOR SECURITIES LITIGATION CLAIMS (0.9).

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ROSEN R	10/23/06	3.10	INVESTIGATION, RESEARCH, COMPILE DETAILED SERVICE INFORMATION RE: HUMAN CAPITAL OBLIGATIONS MOTION, BRIDGE ORDER AND FINAL ORDER IN CONNECTION WITH ISSUES RAISED IN MOTION OF CREDITORS/INTERESTED PARTIES TO COMPEL DELPHI CORPORATION TO ADVANCE LEGAL FEES AND COSTS (DOCKET NO. 5354) AND MOTION OF CERTAIN EMPLOYEES FOR LIMITED RELIEF FROM AUTOMATIC STAY TO PAY AND/OR ADVANCE DEFENSE COSTS UNDER DEBTORS' INSURANCE POLICIES (DOCKET NO. 5360) (2.9); REVIEW, FORWARD SAME TO REQUESTING TEAM ATTORNEY (0.2).
		4.00	
Total Legal Assistant		4.00	
TOTAL TIME		<u>89.90</u>	

SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP AND AFFILIATES

Delphi Corporation (DIP)
Litigation (Insurance Recovery)

Bill Date: 11/30/06
Bill Number: 1132369

Disbursement	Date	Vendor/Employee/Dept.	Amount
In-house Reproduction	10/20/06	Copy Center, D	6.02
In-house Reproduction	10/24/06	Copy Center, D	34.62
In-house Reproduction	10/24/06	Copy Center, D	0.40
In-house Reproduction	10/27/06	Copy Center, D	84.18
In-house Reproduction	10/31/06	Copy Center, D	23.78
TOTAL IN-HOUSE REPRODUCTION			\$149.00
Westlaw	10/02/06	Campanario ND	67.84
Westlaw	10/22/06	Shivakumar D	188.32
Westlaw	10/25/06	Shivakumar D	413.81
Westlaw	10/26/06	Shivakumar D	590.60
Westlaw	10/30/06	MacDonald N	352.76
Westlaw	10/31/06	MacDonald N	57.67
TOTAL WESTLAW			\$1,671.00
Messengers/ Courier	10/04/06	Dist Serv/Mail/Page, D	15.78
Messengers/ Courier	10/22/06	United Parcel Service	41.79
Messengers/ Courier	10/23/06	Dist Serv/Mail/Page, D	6.43
TOTAL MESSENGERS/ COURIER			\$64.00
Outside Re- search/Internet Services	10/05/06	Pacer Service Center	1.00
TOTAL OUTSIDE RESEARCH/INTERNET SERVICES			\$1.00
TOTAL MATTER			\$1,885.00

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Delphi Corporation (DIP) Bill Date: 01/10/07
Litigation (Insurance Recovery)

Bill Number: 1147918

NAME	DATE	HOURS	DESCRIPTION
BUTLER, JR. J	11/21/06	0.60	CONTINUE TO PREPARE FOR NOVEMBER 30TH OMNIBUS HEARING BEFORE JUDGE DRAIN IN NEW YORK BANKRUPTCY COURT RE: FORMER EMPLOYEE INDEMNIFICATION CLAIMS MOTIONS INCLUDING REVIEW AND REVISION OF OBJECTION TO MOTIONS (0.6).
BUTLER, JR. J	11/22/06	1.80	CONTINUE TO PREPARE FOR NOVEMBER 30TH OMNIBUS HEARING BEFORE JUDGE DRAIN IN NEW YORK BANKRUPTCY COURT RE: FORMER EMPLOYEE INDEMNIFICATION CLAIMS MOTIONS INCLUDING REVIEW AND REVISION OF OBJECTION TO MOTIONS (1.8).
BUTLER, JR. J	11/28/06	0.70	CONTINUE TO PREPARE FOR NOVEMBER 30TH OMNIBUS HEARING BEFORE JUDGE DRAIN IN NEW YORK BANKRUPTCY COURT RE: FORMER EMPLOYEE INDEMNIFICATION CLAIMS MOTIONS (0.3); REVIEW AND EVALUATE EQUITY COMMITTEE LETTER TO S. MILLER RE: SAME (0.2); TELECONFERENCE WITH J. SHEEHAN RE: SAME (0.2).
BUTLER, JR. J	11/29/06	0.80	CONTINUE TO PREPARE FOR NOVEMBER 30TH OMNIBUS HEARING BEFORE JUDGE DRAIN IN NEW YORK BANKRUPTCY COURT RE: FORMER EMPLOYEE INDEMNIFICATION CLAIMS MOTIONS (0.8).
BUTLER, JR. J	11/30/06	1.80	PREPARE FOR (INCLUDING WITNESS PREPARATION) (1.1) AND ATTEND (INCLUDING RECESSES) (0.7) OMNIBUS HEARING BEFORE JUDGE DRAIN IN NEW YORK BANKRUPTCY COURT RE: FORMER EMPLOYEE INDEMNIFICATION CLAIMS MOTIONS.
		5.70	
HOGAN III AL	11/02/06	1.60	PREPARE FOR AND PARTICIPATE IN CONFERENCE WITH J. PAPELLIAN AND D. SHIVAKUMAR RE: INSURANCE CLAIMANTS MOTION (FORMER D&OS) AND STRATEGY WITH RESPECT TO RESPONSE TO SAME (1.6).
HOGAN III AL	11/09/06	1.80	REVIEW AND ANALYZE PROPOSED INSURANCE ADVANCEMENT AND LIFT STAY MOTION RESPONSES (1.8).
HOGAN III AL	11/10/06	1.70	CONTINUE TO REVIEW OF POTENTIAL DEBTOR POSITIONS WITH RESPECT TO INSURANCE ADVANCEMENT AND LIFT STAY MOTIONS (0.3); TELECONFERENCE WITH B. CONNOLEY (LATHAM & WATKINS) RE: CREDITORS' COMMITTEE ASSESSMENT OF D&O POLICIES AND POTENTIAL DROP DOWN COVERAGE ISSUES (0.3); FACTUAL INVESTIGATION CONCERNING DROP DOWN COVERAGE, INCLUDING DISCUSSIONS WITH N. MACDONALD AND B. TELEGEN (1.1).

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HOGAN III AL	11/13/06	0.70	TELECONFERENCE WITH B. STEINGART (FRIED FRANK) RE: DEBTORS' RESPONSE TO D&O INSURANCE MOTIONS (0.2); REVIEW CURRENT OUTLINE OF DEBTORS RESPONSE (0.5).
HOGAN III AL	11/14/06	1.20	TELECONFERENCE WITH D. BOUNDE AND B. CONNOLEY (LATHAM AND WATKINS, CREDITORS' COMMITTEE COUNSEL) RE: DEBTORS' RESPONSE TO INSURANCE MOTION, AND MECHANICS OF CERTAIN HIGHER INSURANCE LAYERS (0.4); TELECONFERENCE WITH J. PAPELLIAN RE: DEBTORS' RESPONSE TO D&O INSURANCE MOTIONS. (0.8).
HOGAN III AL	11/20/06	1.20	REVIEW AND COMMENT ON DRAFT PLEADINGS IN CONNECTION WITH ADVANCEMENT AND INSURANCE ACCESS MOTION (0.8); TELECONFERENCE WITH B. STEINGART (FRIED FRANK) RE: DEBTORS' AND EQUITY COMMITTEE'S VIEWS IN RESPECT TO INSURANCE ACCESS MOTION (0.4).
HOGAN III AL	11/21/06	1.10	REVIEW RESPONSES TO ADVANCE MENT AND INSURANCE ACCESS MOTIONS (0.7); REVIEW AND ANALYZE COMMUNICATION FROM EQUITY COMMITTEE RE: SAME (0.4).
HOGAN III AL	11/22/06	0.70	FINAL REVIEW OF INSURANCE ADVANCEMENT AND POLICY ACCESS MOTION PAPERS (0.3); TELECONFERENCE WITH STATUTORY COMMITTEES RE: SAME (0.2); REVIEW EQUITY COMMITTEE PLEADING RE: INSURANCE MOTIONS (0.2).
HOGAN III AL	11/27/06	1.30	ADDRESS MEET AND CONFER REQUESTS AND PLAN FOR CONTESTED HEARING ON INSURANCE ADVANCEMENT AND ACCESS MOTIONS (1.3).
		11.30	
MARAFIOTI KA	11/07/06	1.30	TELECONFERENCE WITH SHEARMAN, FTI, LEXECON AND, FOR A PORTION OF CALL, S. CORCORAN AND D. SHERBIN, RE: MDL LITIGATION (1.3).
MARAFIOTI KA	11/13/06	1.10	TELECONFERENCE WITH B. STEINGART RE: FORMER EMPLOYEES' INDEMNITY MOTION (0.1); ANALYZE INSURANCE AND INDEMNITY ISSUES (0.8); SUBSEQUENT CALL FROM STEINGART RE: SAME (0.2).
MARAFIOTI KA	11/20/06	1.10	REVIEW MOTION OF FORMER EMPLOYEES FOR STAY RELIEF TO REACH INSURANCE (0.7); REVIEW AND REVISE RESPONSE TO SAME (0.4).
MARAFIOTI KA	11/21/06	1.70	CONSIDER MOTION OF FORMER EMPLOYEES FOR STAY RELIEF TO REACH INSURANCE POLICIES FOR DEFENSE COSTS (0.3); REVIEW CORRESPONDENCE FROM B. STEINGART RE: SAME (0.1); REVIEW AND REVISE OBJECTION TO MOTION OF FORMER EMPLOYEES TO ADVANCE LEGAL COSTS (0.9); TELECONFERENCE WITH J. RODBURG RE: SAME (0.1); REVIEW ORDER RE: SAME (0.3).

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MARAFIOTI KA	11/22/06	0.20	TELECONFERENCE AND CORRESPONDENCE FROM J. RODBURG RE: EMPLOYEES' INSURANCE MOTION (0.2).
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5.40

PANAGAKIS GN	11/06/06	1.20	WORK ON MDL LITIGATION (1.2).
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1.20

Total Partner 23.60

MATZ TJ	11/03/06	1.60	REVIEW POSSIBLE TREATMENT OF CLASS ACTION SECURITY CLAIMS (1.3); NOTICE RE: SAME (0.3).
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1.60

SHIVAKUMAR D	11/01/06	4.80	LEGAL RESEARCH IN RESPONSE TO D&O INSURANCE AND LEGAL FEE ADVANCEMENT MOTIONS FROM FORMER EMPLOYEES (4.8).
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SHIVAKUMAR D	11/02/06	8.40	ANALYZE D&O MOTIONS AND RELATED INSURANCE POLICIES IN PREPARATION FOR CONFERENCE CALL WITH J. PAPELIAN (3.6); PREPARE LIST OF OPEN ISSUES NEEDED TO BE RESOLVED IN ORDER TO ASSESS LITIGATION RESPONSE TO FORMER EMPLOYEE MOTIONS (0.7); TELECONFERENCE WITH J. PAPELIAN TO ANALYZE POSSIBLE RESPONSES TO FORMER EMPLOYEE MOTIONS (0.7); RESEARCH RE: D&O ADVANCEMENT ISSUES IN RECENT BANKRUPTCY PROCEEDINGS (1.0); RESEARCH RE: EFFECT OF AUTOMATIC STAY ON INDEMNIFICATION (2.4).
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SHIVAKUMAR D	11/03/06	4.70	ANALYZE SEC RELEASE AND COMPLAINT RE: FORMER EMPLOYEES AND RELATED SECURITIES CLASS ACTION FILINGS (1.5); LEGAL RESEARCH IN FURTHER SUPPORT OF OPPOSITION TO FORMER EMPLOYEES' MOTION TO REQUIRE ADVANCEMENT OF LEGAL FEES AND EXPENSES (4.7).
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SHIVAKUMAR D	11/06/06	8.10	ANALYZE INSURANCE POLICIES AND RELATED CORRESPONDENCE IN RESPONSE TO MOTION FROM FORMER EMPLOYEES FOR AUTHORIZATION TO DRAW ADVANCEMENT (3.8); LEGAL RESEARCH IN PREPARATION FOR DRAFTING OPPOSITION TO MOTION FROM FORMER EMPLOYEES FOR ADVANCEMENT OF LEGAL FEES (4.3).
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SHIVAKUMAR D	11/07/06	10.20	ANALYZE EXCESS INSURANCE POLICIES IN RESPONSE TO MOTION OF FORMER EMPLOYEES (1.6); DRAFT OBJECTION TO ADVANCEMENT MOTION OF FORMER EMPLOYEES (4.7); RESEARCH RELATING TO AUTOMATIC STAY AND INDEMNIFICATION (1.5); RESEARCH RELATING TO WHEN CLAIMS ARISE (2.4).
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SHIVAKUMAR D	11/08/06	8.10	ANALYZE MATERIALS RELATING TO COMPENSATION COMMITTEE DECISION-MAKING IN RESPONSE TO FORMER EMPLOYEE MOTIONS (3.8); DRAFT OBJECTION TO ADVANCEMENT MOTION (4.3).
SHIVAKUMAR D	11/09/06	6.20	ANALYZE INSURANCE CONTRACTS IN RESPONSE TO FORMER EMPLOYEE MOTIONS AND RELATED RESEARCH (2.5); DRAFT OBJECTION TO FORMER EMPLOYEE MOTION RE: ADVANCEMENT OF LEGAL EXPENSES (3.7).
SHIVAKUMAR D	11/10/06	9.50	NEGOTIATION OF PROTECTIVE ORDER AND TERMS BY WHICH DEBTORS WOULD RECEIVE CERTAIN DOCUMENTS FROM GM (2.2); DRAFT OPPOSITION TO FORMER EMPLOYEE MOTIONS (4.6); STRATEGY DISCUSSIONS WITH WORKING GROUP RE: INSURANCE ISSUES IN RESPONSE TO FORMER EMPLOYEE MOTIONS (1.4); RESEARCH RE: NOTICE ON RESPONSE TO FORMER EMPLOYEE ADVANCEMENT MOTION (1.3).
SHIVAKUMAR D	11/13/06	7.30	DRAFT OBJECTION TO FORMER EMPLOYEE ADVANCEMENT MOTION (7.3).
SHIVAKUMAR D	11/14/06	10.70	DRAFT OBJECTION TO FORMER EMPLOYEE MOTION RE: ADVANCEMENT OF DEFENSE COSTS (8.5); ANALYSIS OF EXCESS POLICY IN RESPONSE TO CREDITORS' COMMITTEE QUESTION AND DISCUSSIONS WITH WORKING GROUP RE: SAME (1.2); CONFERENCE CALLS WITH WORKING GROUP RE: INSURANCE ISSUES (1.0).
SHIVAKUMAR D	11/15/06	8.80	TELECONFERENCE WITH WORKING GROUP RE: FORMER EMPLOYEE INSURANCE MOTION (0.5); DRAFT ADDITIONAL SECTIONS OF OBJECTION TO FORMER EMPLOYEE ADVANCEMENT MOTION (3.5); DRAFT RESPONSE TO FORMER EMPLOYEE INSURANCE MOTION (4.8).
SHIVAKUMAR D	11/16/06	9.40	CONTINUE ANALYSIS OF POLICIES, INSURANCE COVERAGE CORRESPONDENCE WITH CARRIER COUNSEL, AND RELATED COVERAGE ISSUES IN CONNECTION WITH PREPARATION OF RESPONSE TO FORMER EMPLOYEE INSURANCE MOTION (3.3); RESEARCH RE: CONSTITUTIONAL RIGHTS RAISED BY FORMER EMPLOYEES (2.5); REVISE DRAFT INSURANCE PROCEEDS MOTION RESPONSE IN LIGHT OF WORKING GROUP COMMENTS (3.6).
SHIVAKUMAR D	11/17/06	6.40	REVISE DRAFTS OF OBJECTION, INSURANCE RESPONSE AND SUPPORTING DECLARATION IN LIGHT OF COMMENTS FROM COMPANY (6.4).
SHIVAKUMAR D	11/18/06	6.20	CONTINUE REVISING AND DRAFTING RESPONSES TO FORMER EMPLOYEE INSURANCE AND ADVANCEMENT MOTIONS (6.2).
SHIVAKUMAR D	11/19/06	5.50	CONTINUE TO REVISE AND DRAFT RESPONSES TO FORMER EMPLOYEE INSURANCE AND ADVANCEMENT MOTIONS (5.5).

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SHIVAKUMAR D	11/20/06	8.90	LEGAL RESEARCH RE: NOTICE REQUIREMENTS UNDER LOCAL RULES IN RESPONSE TO FORMER EMPLOYEE ADVANCEMENT MOTION (1.2); COMPLETE DRAFTS OF RESPONSES TO FORMER EMPLOYEE ADVANCEMENT AND INSURANCE MOTIONS (4.3); COMPLETE DRAFTS OF OPIE DECLARATION IN SUPPORT OF OBJECTION TO ADVANCEMENT MOTION IN LIGHT OF WORKING GROUP COMMENTS (1.1); COMPLETE DRAFT ORDER RELATING TO INSURANCE MOTION (0.8); TELECONFERENCES AND COMMUNICATIONS WITH WORKING GROUP RE: RESPONSES TO FORMER EMPLOYEE MOTIONS AND COMMUNICATIONS WITH INSURANCE CARRIER (1.5).
SHIVAKUMAR D	11/21/06	8.80	REVISE DRAFT OBJECTION TO FORMER EMPLOYEE ADVANCEMENT MOTION (4.7); REVISE DRAFT RESPONSE TO FORMER EMPLOYEE INSURANCE MOTION (2.8); TELECONFERENCES WITH WORKING GROUP RE: FORMER EMPLOYEE MOTIONS AND PROPOSED ORDER (1.3).
SHIVAKUMAR D	11/22/06	8.90	FURTHER LEGAL RESEARCH RE: TIMING OF CLAIMS IN CONNECTION WITH ADVANCEMENT MOTION (0.8); FINALIZE OBJECTION TO ADVANCEMENT MOTION (3.7); FINALIZE RESPONSE TO INSURANCE MOTION (2.4); FINALIZE PROPOSED ORDER IN LIGHT OF WORKING GROUP COMMENTS (0.8); FINALIZE DECLARATION OF J. OPIE (0.5); COORDINATE FILING OF PAPERS RELATING TO FORMER EMPLOYEES' ADVANCEMENT MOTION AND INSURANCE PROCEEDS MOTION (0.7).
SHIVAKUMAR D	11/27/06	8.50	MEET AND CONFER CONFERENCE CALLS WITH MOVANTS AND OBJECTORS TO FORMER EMPLOYEE ADVANCEMENT MOTION AND INSURANCE MOTION AND STRATEGY DISCUSSIONS WITH WORKING GROUP RE: SAME (3.3); PREPARE FOR HEARING ON FORMER EMPLOYEE MOTIONS (5.2).
SHIVAKUMAR D	11/28/06	6.90	REVISE DRAFTS OF ORAL ARGUMENT SCRIPTS RELATING TO FORMER EMPLOYEE MOTIONS (3.8); GATHER RELEVANT CASE LAW AND CORRESPONDENCE AND MAKE OTHER PREPARATIONS FOR HEARING ON FORMER EMPLOYEE MOTIONS (3.1).
SHIVAKUMAR D	11/29/06	9.30	FINALIZE SCRIPTS FOR OMNIBUS HEARING RELATING TO FORMER EMPLOYEE MOTIONS (2.0); MEETINGS WITH WORKING GROUP TO PREPARE FOR HEARINGS ON FORMER EMPLOYEE MOTIONS (1.8); FINAL PREPARATION FOR OMNIBUS HEARING (5.5).
SHIVAKUMAR D	11/30/06	8.20	GATHER RELEVANT PROOFS OF CLAIM, INSURER CORRESPONDENCE, CONFIRMATORY CORRESPONDENCE WITH COUNSEL TO INTERESTED PARTIES, AND OTHER FINAL PREPARATION FOR OMNIBUS HEARING (2.7); ATTEND OMNIBUS HEARING (5.5).

SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP AND AFFILIATES

		173.80	
Total Counsel		175.40	
GRANT K	11/21/06	7.80	REVIEW MOTION OF FORMER EMPLOYEES TO LIFT STAY FOR ADVANCEMENT OF FEES FROM INSURANCE AND REVIEWED DRAFT RESPONSE RE: SAME (1.1); DRAFT HEARING PREPARATION MATERIALS RE: SAME (2.8); REVIEW MOTION OF FORMER EMPLOYEES FOR MODIFICATION OF HURAN CAPITAL ORDER AND TO COMPEL ADVANCEMENT OF FEES AND REVIEWED DRAFT OBJECTION RE: SAME (1.3); DRAFT HEARING PREPARATION MATERIALS RE: SAME (2.6).
GRANT K	11/22/06	2.20	CONTINUE TO WORK ON HEARING PREPARATION MATERIALS RE: FORMER EMPLOYEE MOTIONS (2.2).
GRANT K	11/27/06	1.10	REVIEW OBJECTIONS TO FORMER EMPLOYEE MOTIONS AND UPDATED HEARING PREPARATION MATERIALS RE: SAME (0.9); TELECONFERENCES WITH D. SHIVAKUMAR RE: SAME (0.2).
		11.10	
MACDONALD N	11/01/06	10.90	CONTINUE REVIEW OF DOCUMENTS AND PLEADINGS RELATED TO INDEMNIFICATION AND ADVANCEMENT OBLIGATIONS IN BANKRUPTCY (10.3); DRAFT OUTLINE FOR PROPOSED INTERVIEW RELATED TO SAME (0.6).
MACDONALD N	11/07/06	0.70	CONTINUE REVIEW OF SETTLEMENTS, PLEADINGS, CEASE-AND-DESIST ORDERS IN CONNECTION WITH SEC INVESTIGATION (5.2); BEGIN DRAFT OF RESPONSE TO MOTION FOR RELIEF FROM AUTOMATIC STAY (0.7).
MACDONALD N	11/08/06	11.40	CONTINUE DRAFT OF RESPONSE TO MOTION FOR RELIEF FROM AUTOMATIC STAY (10.6); TELECONFERENCE WITH CLIENT ABOUT MATTERS RELATED TO SAME (0.8).
MACDONALD N	11/09/06	13.70	DRAFT SUMMARY OF INSURANCE COVERAGE ISSUES AND OUTLINE OF RESPONSE TO INSURANCE ISSUES (1.3); CONTINUE DRAFT OF RESPONSE TO MOTION FOR RELIEF FROM AUTOMATIC STAY (12.4).
MACDONALD N	11/10/06	9.90	CONTINUE DRAFT OF RESPONSE TO MOTION FOR RELIEF FROM AUTOMATIC STAY (8.6); REVIEW DOCUMENTS RELATED TO SAME (1.3).
MACDONALD N	11/12/06	5.50	CONTINUE DRAFT OF RESPONSE TO MOTION FOR RELIEF FROM AUTOMATIC STAY (5.5).
MACDONALD N	11/13/06	11.50	CONTINUE DRAFT OF RESPONSE TO MOTION FOR RELIEF FROM AUTOMATIC STAY (10.4); TELECONFERENCE WITH CLIENT RE: MATTERS RELATED TO SAME (0.6); MEET WITH WORKING GROUP RE: SAME AND CASE STATUS (0.5).

SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP AND AFFILIATES

MACDONALD N	11/14/06	10.90	TELECONFERENCE WITH CLIENT RE: MATTERS RELATED TO PENDING INSURANCE MOTION (0.8); CONTINUE DRAFT OF RESPONSE TO INSURANCE MOTION (10.1).
MACDONALD N	11/15/06	6.80	REVIEW DOCUMENTS RELATED TO INSURANCE MOTION (0.7); CONTINUE DRAFT OF RESPONSE TO INSURANCE MOTION (6.1).
MACDONALD N	11/16/06	3.00	LEGAL RESEARCH RELATED TO PREPETITION AND POSTPETITION CLAIMS (2.3); CONTINUE DOCUMENT REVIEW RELATED TO INSURANCE MOTION (0.7).
MACDONALD N	11/17/06	9.40	CONTINUE REVISION OF INSURANCE AND ADVANCEMENT MOTIONS (9.2); TELECONFERENCE WITH CLIENT RE: MATTERS RELATED TO INSURANCE MOTION (0.2).
MACDONALD N	11/19/06	4.20	CONTINUE REVISION OF ADVANCEMENT MOTION DRAFT (3.1); LEGAL RESEARCH RELATED TO SAME (1.1).
MACDONALD N	11/20/06	1.90	REVIEW PLEADINGS AND DOCUMENTS RELATED TO INSURANCE MOTION (1.9).
MACDONALD N	11/21/06	8.60	CONTINUE REVIEW OF PLEADINGS AND DOCUMENTS RELATED TO INSURANCE MOTION AND ADVANCEMENT MOTION (1.7); TELECONFERENCE WITH CLIENT (0.6); CONTINUE REVISION OF DRAFT MOTIONS (5.2); LEGAL RESEARCH RELATED TO SAME (1.1).
MACDONALD N	11/22/06	7.50	CONTINUE REVIEW OF PLEADINGS AND DOCUMENTS RELATED TO INSURANCE MOTION AND ADVANCEMENT MOTION (2.2); TELECONFERENCE WITH CLIENT (0.1); CONTINUE REVISION OF DRAFT MOTIONS (5.2).
MACDONALD N	11/29/06	0.70	CONTINUE REVIEW OF PLEADINGS AND DOCUMENTS RELATED TO INSURANCE MOTION AND ADVANCEMENT MOTION (0.7).
		116.60	
MEISLER RE	11/02/06	0.50	REVIEW AND ANALYZE MOTION OF FORMER EMPLOYEES RE: REQUEST FOR INSURANCE TO COVER ADVANCEMENT OF FEES AND EXPENSES (0.5).
MEISLER RE	11/03/06	0.10	FOLLOW UP WITH J. JANKOWSKI RE: LETTERS TO BREEN (0.1).
MEISLER RE	11/07/06	0.30	TELECONFERENCE WITH D. SHIVAKUMAR RE: MOTION BY FORMER EMPLOYEES FOR INSURANCE PROCEEDS RE: ADVANCEMENT OF FEES AND EXPENSES (0.2); DRAFT NOTES TO FILE RE: SAME (0.1).
MEISLER RE	11/13/06	0.20	CONFERENCE WITH N. MACDONALD RE: OBJECTION TO INSURANCE MOTION RE: ADVANCEMENT OF FEES AND EXPENSES (0.2).

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MEISLER RE	11/14/06	0.20	DRAFT CORRESPONDENCE TO J. PAPELIAN RE: INSURANCE MOTION (0.2).
MEISLER RE	11/19/06	0.80	REVIEW OBJECTION INSURANCE MOTION (0.8).
MEISLER RE	11/20/06	1.30	REVIEW AND COMMENT ON OBJECTION TO ADVANCEMENT OF INSURANCE MOTION (1.1); REVIEW DECLARATION RE: SAME (0.2).
MEISLER RE	11/21/06	3.00	CONTINUE TO REVIEW AND COMMENT ON OBJECTION TO ADVANCEMENT OF FEES AND EXPENSES MOTION (1.9); CONTINUE TO REVIEW AND COMMENT ON RESPONSE TO INSURANCE MOTION (0.9); DRAFT CORRESPONDENCE TO D. SHERBIN RE: SAME (0.2).
MEISLER RE	11/22/06	1.30	CONTINUE TO REVIEW AND COMMENT ON RESPONSE TO INSURANCE MOTION (1.0); TELECONFERENCE WITH J. PAPELIAN RE: SAME (0.1); DRAFT CORRESPONDENCE RE: SAME (0.2).
MEISLER RE	11/27/06	0.30	PREPARE FOR HEARING RE: INSURANCE MOTION (0.3).
MEISLER RE	11/28/06	0.30	CONTINUE HEARING PREPARATIONS RE: RESPONSE TO INSURANCE MOTION (0.2); TELECONFERENCE WITH J. PAPELIAN RE: SAME (0.1).
MEISLER RE	11/29/06	3.40	REVIEW AND COMMENT ON INSURANCE SCRIPT (0.5); REVIEW AND COMMENT ON ADVANCEMENT OF FEES AND EXPENSES SCRIPT (0.5); CONTINUE TO PREPARE FOR OMNIBUS HEARING RE: INSURANCE MOTION (1.3); CONTINUE TO PREPARE FOR OMNIBUS HEARING RE: ADVANCEMENT OF FEES AND EXPENSES (1.1).
MEISLER RE	11/30/06	0.90	REVIEW DOCUMENTS IN SUPPORT OF DEBTORS' POSITION RE: INSURANCE MOTION (0.6); PREPARE FOR HEARING RE: SAME (0.3).
		12.60	
PLATT SJ*	11/08/06	5.90	CONTINUE RESEARCH GENERAL MDL PROCEDURES (3.5); REVIEW STATUS OF MDL PROCEEDINGS (1.9); SEARCH FOR BANKRUPTCY CLAIMS BY MDL PLAINTIFFS (0.5).
PLATT SJ*	11/16/06	0.10	REVIEW DOCKET OF MDL FOR UPDATES (0.1).
		6.00	
STUART NL	11/13/06	5.80	RESEARCH RE: VARIOUS ISSUES RE: MOVANTS' MOTION FOR ADVANCEMENT OF DEFENSE COSTS (5.8).
STUART NL	11/15/06	1.90	RESEARCH RE: NOTICE PROVIDED TO ADVANCEMENT MOTION MOVANTS (1.9).

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STUART NL	11/16/06	2.60	RESEARCH RE: CLAIMS (1.5) AND DRAFT RIDER FOR OBJECTION TO ADVANCEMENT MOTION (1.1).
STUART NL	11/21/06	8.50	RESEARCH RE: CLAIMS ISSUES RELATED TO INSURANCE ADVANCEMENT MOTION (5.2); DRAFT RIDER RE: SAME (1.2); RESEARCH RE: CLAIMS RELATED TO EQUITY SECURITIES/CLASS ACTION LITIGATION (2.1).
STUART NL	11/22/06	1.40	REVIEW CASE LAW FOR INSURANCE ADVANCEMENT MOTION (1.4).
STUART NL	11/28/06	0.40	BEGIN DRAFTING NDA FOR EQUITY COMMITTEE IN CONNECTION WITH INSURANCE ADVANCEMENT MOTION (0.4).
STUART NL	11/29/06	2.90	DRAFT AND REVISE NDA FOR EQUITY COMMITTEE IN CONNECTION WITH INSURANCE ADVANCEMENT MOTIONS (2.9).
		23.50	
Total Associate/Law Clerk		169.80	
ROSEN R	11/06/06	0.80	REVIEW MOTION TO COMPEL DEBTORS TO PAY ADVANCE LEGAL COSTS AND MOTION FOR AUTOMATIC STAY FOR DEBTOR TO PAY DEFENSE COSTS UNDER INSURANCE POLICIES AND COMPILE SPECIAL SERVICE LIST PARTY INFORMATION FOR UPCOMING OBJECTIONS TO SAME (0.8).
ROSEN R	11/21/06	0.40	REVIEW SPECIAL PARTIES SERVICE LISTS, SERVICE PREPARATIONS WITH E. GERSHBEIN, KCC RE: UPCOMING OBJECTIONS TO LEGAL FEES MOTION AND INSURANCE POLICIES PAYMENT MOTION FILINGS (0.4).
ROSEN R	11/22/06	1.20	ASSIST TEAM ATTORNEYS WITH PREPARATIONS FOR FILING OBJECTIONS TO LEGAL FEES MOTION AND INSURANCE POLICIES MOTION (0.8); REVIEW, COORDINATE SERVICE OF SAME WITH E. GERSHBEIN, KCC (0.4).
ROSEN R	11/27/06	0.20	REVIEW STATUS RE: PLAINTIFF'S UPCOMING 11/30 AND 12/15 FILING DEADLINES IN WIL TRUST APPEAL CASES WITH TEAM ATTORNEYS (0.1); REVIEW DRAFT STIPULATION REQUESTING EXTENSION FROM 11/30 TO 2/01/07 FILING DEADLINE RE: SAME (0.1).
ROSEN R	11/29/06	0.40	COMPILE, FORWARD LEGAL FEES MOTION AND OBJECTIONS AND INSURANCE POLICIES MOTION AND OBJECTIONS TO REQUESTING TEAM ATTORNEY FOR SUBMITTAL TO SEC (0.4).
		3.00	
Total Legal Assistant		3.00	
TOTAL TIME		<u>371.80</u>	

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* Law clerks are law school graduates who are not presently admitted to practice.

SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP AND AFFILIATES

Delphi Corporation (DIP)
Litigation (Insurance Recovery)

Bill Date: 01/10/07
Bill Number: 1147918

Disbursement	Date	Vendor/Employee/Dept.	Amount
Air/Rail Travel - vendor feed	11/09/06	Shivakumar D	586.89
Air/Rail Travel - vendor feed	11/09/06	Shivakumar D	-541.89
Air/Rail Travel - vendor feed	11/28/06	Shivakumar D	929.96
Air/Rail Travel - vendor feed	11/30/06	Shivakumar D	359.04
TOTAL AIR/RAIL TRAVEL - VENDOR FEED			\$1,334.00
In-house Reproduction	11/03/06	Copy Center, D	5.51
In-house Reproduction	11/10/06	Copy Center, D	60.53
In-house Reproduction	11/17/06	Copy Center, D	0.40
In-house Reproduction	11/21/06	Copy Center, D	8.72
In-house Reproduction	11/24/06	Copy Center, D	19.84
TOTAL IN-HOUSE REPRODUCTION			\$95.00
Telephone Expense-ECRS only	11/30/06	Telecommunications, D	2.62
Telephone Expense-ECRS only	11/30/06	Telecommunications, D	3.03
Telephone Expense-ECRS only	11/30/06	Telecommunications, D	0.26
Telephone Expense-ECRS only	11/30/06	Telecommunications, D	0.09
TOTAL TELEPHONE EXPENSE-ECRS ONLY			\$6.00
Westlaw	11/01/06	MacDonald N	9.16
Westlaw	11/08/06	MacDonald N	285.96
Westlaw	11/09/06	Shivakumar D	296.03
Westlaw	11/09/06	MacDonald N	47.32
Westlaw	11/10/06	MacDonald N	4.07
Westlaw	11/13/06	Stuart NL	218.96
Westlaw	11/14/06	MacDonald N	8.14
Westlaw	11/15/06	Stuart NL	37.99
Westlaw	11/16/06	Stuart NL	47.15

SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP AND AFFILIATES

Disbursement	Date	Vendor/Employee/Dept.	Amount
Westlaw	11/16/06	MacDonald N	265.61
Westlaw	11/19/06	Shivakumar D	84.74
Westlaw	11/19/06	MacDonald N	354.31
Westlaw	11/20/06	Stuart NL	42.06
Westlaw	11/21/06	Stuart NL	59.87
Westlaw	11/21/06	MacDonald N	147.74
Westlaw	11/22/06	Stuart NL	176.40
Westlaw	11/29/06	Shivakumar D	111.94
Westlaw	11/29/06	Campanario ND	78.36
Westlaw	11/30/06	Rohner WM	67.84
Westlaw	11/30/06	Rohner WM	232.36
Westlaw	11/30/06	Campanario ND	113.99
		TOTAL WESTLAW	\$2,690.00
Out-of-Town Travel	10/25/06	Meisler RE	154.02
Out-of-Town Travel	10/25/06	Meisler RE	414.77
Out-of-Town Travel	10/25/06	Meisler RE	14.21
		TOTAL OUT-OF-TOWN TRAVEL	\$583.00
Messengers/ Courier	11/24/06	Straightline Courier	31.50
Messengers/ Courier	11/24/06	Straightline Courier	31.50
		TOTAL MESSENGERS/ COURIER	\$63.00
Out-of-Town Meals	10/25/06	Meisler RE	2.10
Out-of-Town Meals	10/25/06	Meisler RE	15.21
Out-of-Town Meals	10/25/06	Meisler RE	6.69
		TOTAL OUT-OF-TOWN MEALS	\$24.00
		TOTAL MATTER	\$4,795.00

SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP AND AFFILIATES

Delphi Corporation (DIP)
Litigation (Insurance Recovery)

Bill Date: 01/31/07

Bill Number: 1147919

NAME	DATE	HOURS	DESCRIPTION
HOGAN III AL	12/06/06	0.90	TELECONFERENCE WITH M. BROUDE (CREDITORS' COUNSEL) REGARDING INSURANCE PROCEEDS ORDER (0.3); REVIEW AND ANALYZE ORDER AND POLICIES IN CONNECTION WITH SAME (0.6).
HOGAN III AL	12/11/06	1.10	REVIEW DRAFT MOTION FROM J. PAPELLIAN REGARDING INSURANCE ISSUES (0.8); REVIEW COMMENTS FROM PARTIES TO INSURANCE PROCEEDS MOTIONS REGARDING ORDERS (0.3).
HOGAN III AL	12/12/06	1.10	CONTINUE ANALYSIS OF SUMMARY JUDGMENT MOTION (0.8); CONFERENCES WITH R. STERN (MOVANTS' COUNSEL) REGARDING INSURANCE PROCEEDS ORDERS (0.3).
HOGAN III AL	12/13/06	0.60	REVIEW PROPOSED COMMENTS ON PROCEEDS ORDER FROM MOVANTS, AND OUTLINE COUNTER PROPOSALS TO SAME (0.6).
HOGAN III AL	12/14/06	0.50	DISCUSS INSURANCE PROCEEDS ORDERS WITH J. PAPELLIAN, AND COUNSEL FOR MOVANTS (0.5).
HOGAN III AL	12/18/06	1.40	TELECONFERENCES WITH MOVANTS AND SECURITIES LITIGATION COUNSEL TO FINALIZE INSURANCE PROCEEDS ORDERS (1.2); EDIT AND SUBMIT ORDERS (0.2).
HOGAN III AL	12/26/06	0.40	TELECONFERENCE WITH N. BERGER (TOGUT & SEGAL) REGARDING DEBTORS' ISSUES CONCERNING D&O INSURANCE MATTER (0.4).
		6.00	
Total Partner		6.00	
PLATT SJ	12/29/06	2.00	REVISE MEMO AND COMPLETE FOLLOW UP RESEARCH ON SUBORDINATION OF MDL LITIGANTS' CLAIMS (2.0).
		2.00	
Total Associate		2.00	
TOTAL TIME		<u>8.00</u>	